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**Date** November 3, 2008  
**To** Trisha  
c/o Charles L. A. Terreni  
Chief Clerk & Administrator,  
South Carolina Public Service  
Commission  
**From** Mark D. Taylor  
**Re** Docket No. 2008-400-E  
Progress Energy Carolinas, Inc. v. Pilgrim's Pride Corp.  
**Pages (w/cover)** 20

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Please see the attached documents regarding the above-referenced matter:

1. Pilgrim's Pride Corp.'s Motion for Continuance, or in the Alternative, Pilgrim's Pride, Inc.'s Response to Progress Energy Carolinas, Inc.'s Motion for Expedited Consideration of its Motion for Waiver of Commission Rule 103-331; and
2. Motion for Leave to Appear *Pro Hac Vice* for Mark D. Taylor.

Thank you.

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DOCKETING DEPT.STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2008-400-E

In the Matter of:	
Progress Energy Carolinas, Inc.	
v.	
Pilgrim's Pride Corp.	<b>Pilgrim's Pride, Inc.'s Motion for Continuance, or in the Alternative, Pilgrim's Pride, Inc.'s Response to Progress Energy Carolinas, Inc.'s Motion for Expedited Consideration of its Motion for Waiver of Commission Rule 103-331</b>

Pilgrim's Pride Corporation, for good cause shown, moves for a continuance to respond to Progress Energy Carolinas, Inc.'s ("PEC") Motion for Expedited Consideration of its Motion for Waiver of Commission Rule 103-331. Pilgrim's was not served with notice of this action until late in the afternoon on October 31, 2008 and, consequently, has not had sufficient time to adequately address the facts and law associated with PEC's motion. If, however, the Commission is not inclined to grant Pilgrim's motion, the Commission should deny PEC's motion to waive Rule 103-331 because PEC's motion is not ripe, and because PEC has not made the requisite showing; that is, PEC has not shown that the Commission's refusal to waive the rule would introduce unusual difficulty or that such a waiver would be in the public's interest.

**Factual and Procedural Background**

Pilgrim's is the nation's largest poultry producer and is one of PEC's consumers. As the basis for its Motion, PEC cites to pure speculation contained in a news article that Pilgrim's *may* file for bankruptcy protection.

But Pilgrim's has not engaged in any delinquent payment practices. See PEC's Motion for Waiver of Rule 103-331 ¶ 6. To the contrary, Pilgrim's has paid PEC every

penny it is due and has done so consistently on or before the due date. *See* Declaration of Chuck Thomas attached hereto as Exhibit A. And Pilgrim's fully intends to continue its timely payment practice for all current and future invoices. *Id.*

Notwithstanding Pilgrim's stellar payment history with PEC, on October 29, 2008, PEC filed its Motion for Waiver of Commission Rule 103-331, arguing that the Commission should allow PEC to require Pilgrim's to provide a security deposit or other guarantee because Pilgrim's payment history with PEC prohibits PEC from doing so under the Rules. The next day, PEC filed another motion, asking the Commission for expedited consideration of its motion during its November 5, 2008 meeting.

Pilgrim's did not receive service of either of PEC's motions until late in the day on October 31, 2008. In the ensuing three days, Pilgrim's has had insufficient time to examine the potential effects that such a motion, if granted, would have on Pilgrim's business or to retain local counsel to assist in the matter.

**I. PILGRIM'S SHOULD BE GIVEN THE ALLOTTED THIRTY DAYS TO RESPOND TO PEC'S MOTION.**

There are four reasons why the Commission should permit Pilgrim's to submit its answer to PEC's motion within the originally allotted thirty days, and should not reach the merits of PEC's motion at its November 5, 2008, meeting. First, Pilgrim's needs more time to discern what exactly PEC is asserting as a basis for its motion. To succeed, PEC must establish that Rule 103-331, the rule otherwise prohibiting PEC from requiring Pilgrim's from providing a security deposit due to Pilgrim's timely payment history, "introduces unusual difficulty" and "is in the *public* interest." S.C. Code Regs. 103-301 (emphasis added). Determining whether a rule introduces unusual difficulty on a company, such as PEC, or whether something is in the "public interest" are intensely fact based inquiries.

However, PEC has provided little indication what facts it is basing its request on. The face of PEC's Motion for Waiver of Rule 103-331 does not reveal any factual basis as to why it would be unusually difficult for PEC if the Commission refused to waive the rule or why it would be in the public interest. All that the motion states is that if Pilgrim's files for bankruptcy, PEC *could be* left with a large unpaid bill; but that fact alone does not indicate why that would be unusually difficult for PEC, a large provider of electricity. Moreover, PEC does not definitively indicate why waiving the rule would be in the public's interest. Rather, PEC's motion limits its discussion to its own interests and those of its consumers. Pilgrim's should be allowed more time to explore PEC's claims, and to discover whether there is any basis to them.

Second, Pilgrim's should be allowed to respond in thirty days because PEC's motion for expedited consideration is not ripe and unwarranted. In its motion, PEC raised the specter of an imminent bankruptcy as a reason for granting its expedited motion. PEC submitted, however, nothing to support its fears. In all of its public statements Pilgrim's has denied that a bankruptcy filing is imminent, and PEC has not presented anything but speculation to the contrary.

Third, if, as PEC argues, Pilgrim's is in "severe financial difficulty," Pilgrim's should be provided with time to provide for the Commission information indicating what effect, if any, granting PEC's motion would have not only on Pilgrim's, but the many citizens of South Carolina that Pilgrim's employs. To date, Pilgrim's, the nation's largest poultry producer, has had only three calendar days (one business day) to assess these potential effects. The Commission deserves to have all of the relevant facts before it prior to

determining whether waiving Rule 103-331 is truly in the public's, and not merely in PEC's or its consumers', interest.

Fourth, although Pilgrim's denies that it is headed for bankruptcy, Pilgrim's believes that some of its defenses to the argument that PEC advanced in its motion—that Rule 103-331 introduces unusual difficulty on PEC and its customers because, without a waiver, they will be left unprotected—might be based in the bankruptcy code. Bankruptcy is already a complex area of law. But apply that cannon to Pilgrim's and all of its assets and interests and the issues only increase in their complexity. Accordingly, Pilgrim's should be given the allotted thirty days to respond so that it can adequately address these and other potential defenses to PEC's arguments.

Finally, given its payment history with PEC, Pilgrim's has not had any prior opportunity to come before the Commission, and therefore, lacks the expertise that PEC has in appearing before the Commission. Accordingly, Pilgrim's should be given more time to retain local counsel who can help advise Pilgrim's on how to proceed in this case before the Commission.

Given that PEC lacks any reliable proof of an imminent Pilgrim's default, and given the short amount of time that Pilgrim's has had to weight these factually and legally complex issues, Pilgrim's should not be required to respond to PEC by November 5, 2008. Rather, to ensure that the Commission's decision is truly in the public's interest, Pilgrim's should be permitted to further research the facts and law associated with PEC's Motion for Waiver of Rule 103-331, and present those facts to the Commission for review at a date not sooner than December 1, 2008; that is, thirty days after it was served with process in the underlying action.

**II. IN THE ALTERNATIVE, PEC'S MOTION SHOULD BE DENIED EITHER BECAUSE IT IS UNRIPE OR BECAUSE PEC HAS NOT SUBMITTED SUFFICIENT PROOF EITHER THAT BUT FOR A WAIVER OF RULE 103-331, THE RULE WILL INTRODUCE UNUSUAL DIFFICULT UPON IT OR THAT SUCH WAIVER IS IN THE PUBLIC'S INTEREST.**

If the Commission is not inclined to give Pilgrim's more time to prepare against PEC's motion, PEC's motion should be denied on its merits. The motion is not ripe because it is based on conjecture and speculation and could be mooted in less than thirty days. Moreover, PEC has not met its burden of proving that Rule 103-331 introduces unusual difficulty or that waiving such a rule, and requiring Pilgrim's to pay a security deposit, would be in the public's interest. Given, however, that Pilgrim's has had only three calendar days to respond to PEC's arguments, Pilgrim's reserves the right to supplement these arguments and make additional arguments at a future date.

First, as noted above, PEC's Expedited Motion for Waiver of Rule 103-331 should be denied because it is not ripe. The stated factual grounds that PEC sought a waiver of Rule 103-331 is PEC's fear that Pilgrim's *might* file bankruptcy and *might* default on paying its invoice in the future, despite the fact that Pilgrim's has paid, and intends to continue paying, all invoices from PEC on a timely basis. However, PEC has not presented evidence or argument that any such default is imminent. *Cf. Abbott Laboratories v. Gardner*, 387 U.S. 136 (1967). And the fact that Pilgrim's lenders have agreed to continue providing it with credit militates against such a finding. Until such time that Pilgrim's actually defaults, PEC should not be allowed to require of Pilgrim's what the rules expressly state PEC cannot do: require Pilgrim's to provide a security deposit or other guarantee.

Second, PEC has not shown that requiring it to continue to comply with Rule 103-331, i.e., require security deposits only from those customers who show delinquent payment practices, would impose "unusual difficulty." The tacit assumption underlying PEC's entire

motion is that if Pilgrim's files bankruptcy, neither PEC nor its customers will be adequately protected. PEC, however, provides no factual or legal basis for its assumption. PEC admits that Pilgrim's has never shown delinquent payment practices, and that that it cannot show that Pilgrim's has engaged in any other qualifying conduct under Rule 103-331. PEC has not explained why, even if Pilgrim's did enter bankruptcy (a fact Pilgrim's in no way concedes or even intimates is a possibility), Pilgrim's would not pay its invoice. Bankruptcy is not, after all, synonymous with non-payment. Furthermore, PEC has not explained why the bankruptcy process would not itself adequately protect PEC or its customers. For these reasons, and any others that Pilgrim's may later raise, PEC has not shown that Rule 103-331 imposes "unusual difficulty" in this case.

Third, although PEC made it clear that requiring Pilgrim's to provide PEC with a security deposit or other guarantee would be in *its* best interests, PEC has not shown that such a requirement would be in the *public's* interest. Taking PEC's allegations and assertions regarding Pilgrim's precarious financial status as true (and making no indication as to the truth of such allegations and assertions), it remains to be seen how it is in the public's interest to require an insolvent, or quasi-insolvent, employer of hundreds of South Carolina residents to pay several hundred thousand dollars for a security deposit. Such action, especially if followed by the hundred or so other utility companies servicing Pilgrim's other operations, could itself precipitate the foretold filing of a bankruptcy petition, and thereby potentially jeopardize the jobs of hundreds of South Carolina citizens. That action is in the best interests of no one.

For these reasons, Pilgrim's asks the Commission to grant Pilgrim's the requisite 30 days to respond, or in the alternative, deny PEC's request on the grounds that PEC's request

is not ripe, or on grounds that PEC has not shown the “unusually difficult” and “public interest” requisites for the posting of a security deposit.

Respectfully submitted,



Mark D. Taylor

Texas Bar No. 19713250

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ATTORNEY FOR RESPONDENT  
PILGRIM'S PRIDE CORPORATION



# Exhibit A

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION


DOCKET NO 2008-400-E

In the Matter of:  Progress Energy Carolinas, Inc.  v.  Pilgrim's Pride Corp.	<b>Pilgrim's Pride, Inc.'s Motion for Continuance, or in the Alternative, Pilgrim's Pride, Inc.'s Response to Progress Energy Carolinas, Inc.'s Motion for Expedited Consideration of its Motion for Waiver of Commission Rule 103-331</b>
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**DECLARATION OF CHUCK THOMAS**

1. My name is Chuck Thomas. I am over the age of twenty-one (21) years, of sound mind, have never been convicted of a felony, and am capable of making this Declaration. I have personal knowledge of the facts stated herein, and all of the facts herein are true and correct. I further state that I am fully authorized and competent to testify to the matters and opinions set out in this Declaration.
2. Pilgrim's uses Progress Energy Carolinas, Inc. ("PEC") as its provider of electricity for its plant in Sumter, South Carolina.
3. Attached to this declaration is a true and correct copy of a spreadsheet representing Pilgrim's payment history with PEC, which was prepared in the ordinary course of business, and according to Pilgrim's regular practice of recording such information.
4. As evidenced by the spreadsheet, Pilgrim's typical payment practice is to pay any invoice received from PEC on or before the due date.
5. Pilgrim's has no outstanding invoices from PEC. In addition, Pilgrim's is current with its payments to PEC.
6. Pilgrim's intends to continue paying PEC on or before the due date

I declare under penalty of perjury under the laws of the state of Texas that the foregoing is true and correct. Executed on November 3, 2008.

 11/3/08  
\_\_\_\_\_  
Chuck Thomas

Client Name	Account Number	Vendor Name	From Date	Read Date	Entry Date	Due Date	FRQ	Due Date	Late Fee	Amount Due	Location Name
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	08/04/07	10/03/07	10/09/07	10/18/07	10/09/07	10/09/07	0.	5.8	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	11/01/07	11/01/07	11/12/07	11/18/07	11/12/07	11/12/07	0.	5.8	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	12/03/07	12/03/07	12/12/07	12/18/07	12/12/07	12/12/07	0.	5.8	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	01/03/08	01/03/08	01/11/08	01/18/08	01/11/08	01/11/08	0.	5.8	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	02/05/08	02/05/08	02/12/08	02/20/08	02/12/08	02/12/08	0.	5.8	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	03/04/08	03/04/08	03/11/08	03/19/08	03/11/08	03/11/08	0.	5.8	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	03/04/08	03/04/08	04/10/08	04/18/08	04/10/08	04/10/08	0.	7.74	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	03/04/08	03/04/08	04/13/08	04/15/08	04/13/08	04/13/08	0.	5.81	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	04/03/08	05/05/08	05/12/08	05/20/08	05/12/08	05/12/08	0.	4.36	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	05/05/08	06/04/08	06/11/08	06/19/08	06/11/08	06/11/08	0.	5.81	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	06/04/08	07/03/08	07/10/08	07/18/08	07/10/08	07/10/08	0.	6.07	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	07/03/08	08/05/08	08/11/08	08/20/08	08/11/08	08/11/08	0.	8.09	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	07/03/08	08/05/08	08/28/08	08/28/08	08/28/08	08/28/08	0.	6.07	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	08/05/08	09/04/08	09/10/08	09/19/08	09/10/08	09/10/08	0.	6.07	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	09/04/08	10/03/08	10/10/08	10/20/08	10/10/08	10/10/08	0.	4.56	Sumter - Feedmill
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	09/04/07	10/03/07	10/09/07	10/18/07	10/09/07	10/09/07	0.	1.94	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	10/03/07	11/01/07	11/12/07	11/18/07	11/12/07	11/12/07	0.	1.94	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	11/01/07	12/03/07	12/12/07	12/18/07	12/12/07	12/12/07	0.	1.94	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	12/03/07	01/03/08	01/11/08	01/18/08	01/11/08	01/11/08	0.	1.94	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	01/03/08	02/05/08	02/12/08	02/20/08	02/12/08	02/12/08	0.	1.94	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	02/05/08	03/04/08	03/11/08	03/19/08	03/11/08	03/11/08	0.	1.94	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	03/04/08	04/03/08	04/10/08	04/18/08	04/10/08	04/10/08	0.	1.83	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	04/03/08	05/05/08	05/12/08	05/20/08	05/12/08	05/12/08	0.	1.45	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	05/05/08	06/04/08	06/11/08	06/19/08	06/11/08	06/11/08	0.	1.93	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	06/04/08	07/03/08	07/10/08	07/18/08	07/10/08	07/10/08	0.	2.02	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	07/03/08	08/05/08	08/11/08	08/20/08	08/11/08	08/11/08	0.	2.02	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	08/05/08	09/04/08	09/10/08	09/19/08	09/10/08	09/10/08	0.	2.02	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	09/04/08	10/03/08	10/10/08	10/20/08	10/10/08	10/10/08	0.	1.51	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	10/03/07	10/03/07	10/09/07	10/18/07	10/09/07	10/09/07	0.	170.58	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	10/03/07	10/03/07	11/08/07	11/19/07	11/08/07	11/08/07	0.	193.6	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/13/07	12/19/07	12/13/07	12/13/07	0.	220.52	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/10/08	01/18/08	01/10/08	01/10/08	0.	262.63	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/07/08	02/19/08	02/07/08	02/07/08	0.	268.88	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/10/08	03/19/08	03/10/08	03/10/08	0.	230.88	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/07/08	04/17/08	04/07/08	04/07/08	0.	235.82	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/09/08	05/19/08	05/09/08	05/09/08	0.	228.19	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/09/08	06/18/08	06/09/08	06/09/08	0.	178.79	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/07/08	07/17/08	07/07/08	07/07/08	0.	164.99	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	07/02/08	08/04/08	08/11/08	08/19/08	08/11/08	08/11/08	0.	147.39	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	08/04/08	09/03/08	09/09/08	09/18/08	09/09/08	09/09/08	0.	154.01	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/07/08	10/17/08	10/07/08	10/07/08	0.	352.15	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	10/02/08	10/07/08	10/09/07	10/18/07	10/09/07	10/09/07	0.	213.27	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	10/07/08	10/31/07	11/08/07	11/18/07	11/08/07	11/08/07	0.	156.18	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	11/29/07	12/31/07	12/19/07	12/19/07	12/19/07	12/19/07	0.	190.75	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	12/31/07	01/03/08	01/10/08	01/17/08	01/10/08	01/10/08	0.	301.5	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	01/03/08	02/04/08	02/07/08	02/18/08	02/07/08	02/07/08	0.	278.78	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/10/08	03/19/08	03/10/08	03/10/08	0.	285.89	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	03/03/08	04/01/08	04/07/08	04/18/08	04/07/08	04/07/08	0.	312.59	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	04/01/08	05/01/08	05/06/08	05/18/08	05/06/08	05/06/08	0.	311.99	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	05/01/08	06/02/08	06/09/08	06/17/08	06/09/08	06/09/08	0.	326.18	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	06/02/08	07/01/08	07/07/08	07/16/08	07/07/08	07/07/08	0.	338.08	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	07/01/08	08/01/08	08/07/08	08/18/08	08/07/08	08/07/08	0.	345.21	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	08/01/08	09/02/08	09/08/08	09/17/08	09/08/08	09/08/08	0.	346.55	Sumter - Processing
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	09/02/08	10/02/08	10/07/08	10/17/08	10/07/08	10/07/08	0.	9.74	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	10/02/08	10/02/07	10/05/07	10/18/07	10/05/07	10/05/07	0.	9.84	Sumter - Hatchery
Pilgrim's Pride Corporation	0620474916A	Progress Energy Carolinas, Inc.	10/02/07	10/31/07	11/06/07	11/19/07	11/06/07	11/06/07	0.		

Client Name	Account Number	Vendor Name	From Date	Read Date	Entry Date	Due Date	FRQ Date	Late Fee	Amount Due	Location Name
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/05/07	12/19/07	12/05/07	0.	16.69	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/10/08	01/18/08	01/07/08	0.	9.74	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/05/08	02/20/08	02/08/08	0.	9.84	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/03/08	03/19/08	03/05/08	0.	16.56	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	04/02/08	04/02/08	04/02/08	04/17/08	04/03/08	0.	16.23	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/02/08	05/19/08	05/06/08	0.	10.06	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/03/08	06/24/08	06/11/08	0.	9.74	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	06/03/08	07/03/08	07/03/08	07/24/08	07/11/08	0.	9.74	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	07/03/08	08/03/08	08/03/08	08/24/08	08/13/08	0.	9.85	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	08/03/08	09/04/08	09/04/08	09/24/08	09/10/08	0.	9.74	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	09/04/08	10/02/08	10/02/08	10/20/08	10/07/08	0.	9.63	Sumter - Hatchery
Pilgrim's Pride Corporation	1351796550	Progress Energy Carolinas, Inc.	09/30/07	10/07/07	10/05/07	10/16/07	10/05/07	0.	173.38	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	10/01/07	10/31/07	11/05/07	11/19/07	11/05/07	0.	173.38	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	10/31/07	11/29/07	12/10/07	12/18/07	12/10/07	0.	157.83	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	11/29/07	01/02/08	01/09/08	01/17/08	01/09/08	0.	153.33	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	01/02/08	02/01/08	02/07/08	02/16/08	02/08/08	0.	148.59	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	02/01/08	02/29/08	03/10/08	03/18/08	03/10/08	0.	152.65	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	02/29/08	04/01/08	04/07/08	04/16/08	04/07/08	0.	131.89	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	04/01/08	05/05/08	05/07/08	05/21/08	05/08/08	0.	132.12	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	05/05/08	06/02/08	06/03/08	06/17/08	06/09/08	0.	171.15	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	06/02/08	07/01/08	07/07/08	07/17/08	07/07/08	0.	133.55	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	07/01/08	08/01/08	08/07/08	08/18/08	08/07/08	0.	166.84	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	08/01/08	09/02/08	09/08/08	09/17/08	09/08/08	0.	172.12	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	09/02/08	10/02/08	10/07/08	10/17/08	10/08/08	0.	173.14	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	09/02/08	10/02/08	10/07/08	10/17/08	10/08/08	0.	164.28	Sumter - Processing
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	10/02/07	10/31/07	11/09/07	11/19/07	11/08/07	0.	72.41	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/13/07	12/19/07	12/13/07	0.	72.41	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/11/08	01/18/08	01/11/08	0.	72.41	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/11/08	02/20/08	02/11/08	0.	72.41	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/11/08	03/19/08	03/11/08	0.	72.41	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/09/08	04/18/08	04/09/08	0.	72.41	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/10/08	05/19/08	05/10/08	0.	74.89	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/11/08	06/20/08	06/11/08	0.	74.89	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/11/08	07/20/08	07/11/08	0.	74.89	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	07/02/08	08/04/08	08/11/08	08/20/08	08/11/08	0.	74.89	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	08/04/08	09/03/08	09/09/08	09/19/08	09/10/08	0.	2,359.13	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/10/08	10/20/08	10/11/08	0.	2,280.9	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	09/30/07	10/31/07	11/08/07	11/19/07	11/08/07	0.	2,755.38	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/13/07	12/19/07	12/13/07	0.	2,587.71	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/11/08	01/18/08	01/11/08	0.	2,411.28	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/11/08	02/20/08	02/11/08	0.	2,052.75	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/11/08	03/19/08	03/11/08	0.	2,202.68	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/10/08	04/18/08	04/10/08	0.	2,263.43	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/09/08	05/20/08	05/09/08	0.	2,709.59	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/11/08	06/20/08	06/11/08	0.	2,690.83	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/11/08	07/20/08	07/11/08	0.	2,879.43	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	07/02/08	08/04/08	08/11/08	08/20/08	08/11/08	0.	2,569.45	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	08/04/08	09/03/08	09/09/08	09/19/08	09/10/08	0.	2,543.36	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/10/08	10/20/08	10/11/08	0.	43,392.42	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	10/02/07	10/31/07	11/08/07	11/19/07	11/08/07	0.	35,743.27	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/13/07	12/19/07	12/13/07	0.	37,770.55	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/11/08	01/18/08	01/11/08	0.	37,862.66	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/11/08	02/20/08	02/11/08	0.	48,800.71	Sumter - Feedmill
Pilgrim's Pride Corporation	2221191519	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/11/08	03/19/08	03/11/08	0.	35,997.02	Sumter - Feedmill

Client Name	Account Number	Vendor Name	From Date	Read Date	Entry Date	Due Date	FRQ Date	Late Fee	Amount Due	Location Name
Pilgrim's Pride Corporation	2819374915-TD0429	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/10/08	04/18/08	04/11/08	0.	35,936.08	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-TD0429	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/09/08	05/20/08	05/09/08	0.	35,971.53	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-TD0429	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/10/08	06/19/08	06/11/08	0.	35,311.06	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-TD0429	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/11/08	07/21/08	07/11/08	0.	38,588.03	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-TD0429	Progress Energy Carolinas, Inc.	07/02/08	08/04/08	08/11/08	08/20/08	08/12/08	0.	40,413.14	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-TD0429	Progress Energy Carolinas, Inc.	08/04/08	09/03/08	09/09/08	09/19/08	09/10/08	0.	38,007.55	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-TD0429	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/10/08	10/20/08	10/11/07	0.	37,821.54	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	10/02/08	10/31/07	11/08/07	11/19/07	11/08/07	0.	545.79	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/07/07	12/18/07	12/08/07	0.	438.36	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	11/30/07	12/31/07	01/11/08	01/18/08	01/11/08	0.	359.54	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/11/08	02/20/08	02/11/08	0.	387.2	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/11/08	03/21/08	03/11/08	0.	400.12	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/10/08	04/18/08	04/10/08	0.	349.88	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/10/08	05/20/08	05/09/08	0.	391.58	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/10/08	06/19/08	06/11/08	0.	453.78	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/11/08	07/21/08	07/11/08	0.	525.69	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	07/02/08	08/03/08	08/11/08	08/20/08	08/12/08	0.	555.01	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4094	Progress Energy Carolinas, Inc.	08/03/08	09/03/08	09/10/08	09/19/08	09/10/08	0.	535.8	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	08/31/07	10/02/07	10/10/07	10/18/07	10/11/07	0.	525.3	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	10/02/07	10/31/07	11/08/07	11/19/07	11/08/07	0.	748.96	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/07/07	12/18/07	12/07/07	0.	652.12	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/11/08	02/20/08	02/11/08	0.	700.51	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/11/08	03/21/08	03/11/08	0.	800.93	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/10/08	04/18/08	04/11/08	0.	641.1	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/10/08	05/20/08	05/09/08	0.	722.63	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/10/08	06/19/08	06/11/08	0.	650.22	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/11/08	07/21/08	07/11/08	0.	634.54	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	07/02/08	08/03/08	08/11/08	08/20/08	08/12/08	0.	792.54	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	08/03/08	09/03/08	09/10/08	09/19/08	09/10/08	0.	876.78	Sumter - Feedmill
Pilgrim's Pride Corporation	2819374915-WY4786	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/10/08	10/20/08	10/14/08	0.	749.2	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	10/02/08	10/31/07	11/07/07	11/19/07	11/07/07	0.	65.42	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/07/07	12/18/07	12/07/07	0.	59.69	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/07/08	01/18/08	01/07/08	0.	55.85	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/06/08	02/19/08	02/06/08	0.	51.22	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/06/08	03/19/08	03/06/08	0.	49.3	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/04/08	04/17/08	04/04/08	0.	45.6	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/10/08	05/19/08	05/09/08	0.	48.03	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/10/08	06/19/08	06/09/08	0.	52.31	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/11/08	07/21/08	07/11/08	0.	57.68	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100A	Progress Energy Carolinas, Inc.	07/02/08	08/03/08	08/11/08	08/20/08	08/09/08	0.	65.12	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	08/03/08	09/03/08	09/10/08	09/19/08	09/03/08	0.	73.91	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/04/08	10/17/08	10/03/08	0.	68.5	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	10/02/08	10/31/07	11/07/07	11/19/07	11/07/07	0.	64.42	Sumter - Feedmill
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/07/07	12/18/07	12/07/07	0.	21.81	Sumter - Hatchery
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/07/08	01/18/08	01/07/08	0.	18.91	Sumter - Hatchery
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/06/08	02/19/08	02/06/08	0.	18.62	Sumter - Hatchery
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/06/08	03/19/08	03/06/08	0.	17.08	Sumter - Hatchery
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/04/08	04/17/08	04/04/08	0.	18.43	Sumter - Hatchery
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/04/08	05/19/08	05/04/08	0.	15.2	Sumter - Hatchery
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/09/08	06/19/08	06/09/08	0.	16.02	Sumter - Hatchery
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/11/08	07/21/08	07/11/08	0.	17.44	Sumter - Hatchery
Pilgrim's Pride Corporation	3415464100B	Progress Energy Carolinas, Inc.	07/02/08	08/03/08	08/11/08	08/20/08	08/09/08	0.	19.24	Sumter - Hatchery



Client Name	Account Number	Vendor Name	From Date	Read Date	Entry Date	Due Date	FRQ Date	Late Fee	Amount Due	Location Name
Pilgrim's Pride Corporation	4116300007-TE6787	Progress Energy Carolinas, Inc.	07/02/08	08/04/08	08/12/08	08/20/08	08/12/08	0.	18,148.22	Sumter - Hatchery
Pilgrim's Pride Corporation	4116300007-TE6787	Progress Energy Carolinas, Inc.	08/04/08	09/03/08	09/10/08	09/19/08	09/10/08	0.	16,144.2	Sumter - Hatchery
Pilgrim's Pride Corporation	4116300007-TE6787	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/03/08	10/20/08	10/10/08	0.	16,411.21	Sumter - Hatchery
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	08/30/07	10/01/07	10/05/07	10/16/07	10/05/07	0.	386.34	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	10/01/07	10/31/07	11/06/07	11/16/07	11/06/07	0.	370.37	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	10/31/07	11/29/07	12/10/07	12/18/07	12/10/07	0.	336.34	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	11/29/07	12/31/07	01/08/08	01/17/08	01/08/08	0.	372.44	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	12/31/07	02/01/08	02/07/08	02/18/08	02/07/08	0.	320.78	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	02/01/08	02/23/08	03/10/08	03/18/08	03/10/08	0.	378.6	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	02/23/08	04/01/08	04/07/08	04/16/08	04/07/08	0.	334.27	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	04/01/08	05/01/08	05/08/08	05/16/08	05/08/08	0.	348.68	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	05/01/08	06/02/08	06/09/08	06/17/08	06/09/08	0.	398.11	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	06/02/08	07/01/08	07/07/08	07/16/08	07/07/08	0.	423.62	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	07/01/08	08/01/08	08/07/08	08/16/08	08/07/08	0.	427.59	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	08/01/08	08/20/08	09/08/08	09/17/08	09/08/08	0.	423.68	Sumter - Processing
Pilgrim's Pride Corporation	4410191516	Progress Energy Carolinas, Inc.	08/20/08	10/02/08	10/07/08	10/17/08	10/08/08	0.	414.89	Sumter - Processing
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	08/04/07	10/03/07	10/09/07	10/18/07	10/09/07	0.	4.24	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	10/03/07	11/01/07	11/12/07	11/16/07	11/12/07	0.	4.24	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	11/01/07	12/03/07	12/05/07	12/18/07	12/05/07	0.	4.24	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	12/03/07	01/03/08	01/07/08	01/18/08	01/07/08	0.	4.24	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	01/03/08	02/05/08	02/07/08	02/20/08	02/07/08	0.	4.24	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	02/05/08	03/04/08	03/06/08	03/19/08	03/06/08	0.	4.24	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	03/04/08	04/02/08	04/07/08	04/18/08	04/07/08	0.	4.24	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	04/02/08	05/05/08	05/08/08	05/20/08	05/08/08	0.	4.24	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	05/05/08	06/04/08	06/06/08	06/19/08	06/06/08	0.	4.24	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	06/04/08	07/03/08	07/09/08	07/21/08	07/09/08	0.	4.41	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	07/03/08	08/05/08	08/11/08	08/22/08	08/11/08	0.	4.41	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	08/05/08	09/04/08	09/10/08	09/19/08	09/10/08	0.	4.41	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	09/04/08	10/03/08	10/08/08	10/20/08	10/15/08	0.	4.41	Sumter - Hatchery
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	10/03/08	10/30/07	10/30/07	10/18/07	10/09/07	0.	12.71	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	10/30/07	11/01/07	11/12/07	11/16/07	11/12/07	0.	12.71	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	11/01/07	12/03/07	12/05/07	12/18/07	12/05/07	0.	12.71	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	12/03/07	01/03/08	01/07/08	01/18/08	01/07/08	0.	12.71	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	01/03/08	02/05/08	02/07/08	02/20/08	02/07/08	0.	12.71	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	02/05/08	03/04/08	03/06/08	03/19/08	03/06/08	0.	12.71	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	03/04/08	04/02/08	04/07/08	04/18/08	04/07/08	0.	12.71	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	04/02/08	05/05/08	05/08/08	05/20/08	05/08/08	0.	12.71	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	05/05/08	06/04/08	06/06/08	06/19/08	06/06/08	0.	12.71	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	06/04/08	07/03/08	07/09/08	07/21/08	07/09/08	0.	13.24	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	07/03/08	08/05/08	08/11/08	08/22/08	08/11/08	0.	13.24	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	08/05/08	09/04/08	09/10/08	09/19/08	09/10/08	0.	13.24	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	09/04/08	10/03/08	10/08/08	10/20/08	10/15/08	0.	13.24	Sumter - Feedmill
Pilgrim's Pride Corporation	4440774919A	Progress Energy Carolinas, Inc.	10/03/08	10/30/07	10/30/07	10/18/07	10/09/07	0.	463.815	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	08/25/07	09/29/07	10/09/07	10/16/07	10/09/07	0.	390.285	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	09/29/07	10/27/07	11/05/07	11/13/07	11/05/07	0.	360.294	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	10/27/07	11/24/07	12/03/07	12/12/07	12/03/07	0.	414.757	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	11/24/07	12/29/07	01/08/08	01/16/08	01/08/08	0.	349.557	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	12/29/07	01/26/08	02/04/08	02/12/08	02/04/08	0.	362.517	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	01/26/08	03/03/08	03/10/08	03/17/08	03/03/08	0.	412.902	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	03/03/08	03/23/08	04/07/08	04/15/08	04/07/08	0.	309.814	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	03/23/08	04/26/08	05/07/08	05/14/08	05/07/08	0.	309.814	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	04/26/08	05/24/08	06/02/08	06/11/08	06/02/08	0.	316.125	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	05/24/08	06/28/08	07/06/08	07/15/08	07/06/08	0.	374.705	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	06/28/08	07/26/08	08/03/08	08/12/08	08/03/08	0.	365.907	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	07/26/08	08/23/08	09/02/08	09/09/08	09/02/08	0.	364.888	Sumter - Processing
Pilgrim's Pride Corporation	575291510	Progress Energy Carolinas, Inc.	08/23/08	09/27/08	10/03/08	10/14/08	10/06/08	0.	439.873	Sumter - Processing



<u>Cliant Name</u>	<u>Account Number</u>	<u>Vendor Name</u>	<u>From Date</u>	<u>Read Date</u>	<u>Entry Date</u>	<u>Due Date</u>	<u>FRQ Date</u>	<u>Late Fee</u>	<u>Amount Due</u>	<u>Location Name</u>
Pilgrim's Pride Corporation	5775231510	Progress Energy Carolinas, Inc.	08/23/08	08/27/08	10/01/08	10/14/08		0.	439,873.35	Sumter - Processing
Pilgrim's Pride Corporation	5775231510	Progress Energy Carolinas, Inc.	08/27/08	10/25/08	10/03/08	11/12/08	10/30/08	0.	340,983.67	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	08/30/07	10/01/07	10/05/07	10/16/07	10/05/07	0.	23.33	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	10/01/07	10/31/07	10/31/07	11/06/07	11/06/07	0.	18.1	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	10/31/07	11/29/07	12/10/07	12/18/07	12/10/07	0.	23.33	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	11/29/07	12/31/07	01/09/08	01/17/08	01/09/08	0.	23.33	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	12/31/07	02/01/08	02/07/08	02/18/08	02/07/08	0.	44.26	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	02/01/08	02/29/08	03/10/08	03/18/08	03/10/08	0.	28.57	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	02/29/08	04/01/08	04/07/08	04/18/08	04/07/08	0.	28.57	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	04/01/08	05/01/08	05/06/08	05/16/08	05/06/08	0.	23.33	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	05/01/08	06/02/08	06/09/08	06/17/08	06/09/08	0.	23.33	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	06/02/08	07/01/08	07/07/08	07/16/08	07/07/08	0.	23.63	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	07/01/08	08/01/08	08/07/08	08/16/08	08/07/08	0.	23.63	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	08/01/08	09/02/08	09/08/08	09/17/08	09/08/08	0.	23.63	Sumter - Processing
Pilgrim's Pride Corporation	5984191517	Progress Energy Carolinas, Inc.	09/02/08	10/02/08	10/07/08	10/17/08	10/08/08	0.	151.63	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	09/02/08	10/02/08	10/07/08	10/17/08	10/08/08	0.	177.69	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	10/02/07	10/31/07	11/08/07	11/19/07	11/08/07	0.	124.84	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/13/07	12/19/07	12/13/07	0.	279.74	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/13/08	01/18/08	01/10/08	0.	279.79	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/06/08	02/19/08	02/08/08	0.	224.9	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/10/08	03/19/08	03/10/08	0.	189.88	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/07/08	04/17/08	04/07/08	0.	184.28	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/08/08	05/18/08	05/08/08	0.	187.74	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/09/08	06/17/08	06/09/08	0.	180.89	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/08/08	07/17/08	07/08/08	0.	257.97	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	07/02/08	08/04/08	08/12/08	08/19/08	08/12/08	0.	248.66	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	08/04/08	09/03/08	09/09/08	09/18/08	09/09/08	0.	427.63	Sumter - Processing
Pilgrim's Pride Corporation	6778832516	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/07/08	10/17/08	10/07/08	0.	41.68	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	10/02/07	10/31/07	11/08/07	11/19/07	11/08/07	0.	41.61	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/13/07	12/19/07	12/13/07	0.	42.69	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/13/08	01/18/08	01/10/08	0.	42.61	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/06/08	02/19/08	02/10/08	0.	41.69	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/10/08	03/19/08	03/10/08	0.	42.29	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/07/08	04/17/08	04/08/08	0.	41.85	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/12/08	05/18/08	05/12/08	0.	42.18	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/09/08	06/17/08	06/09/08	0.	42.68	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/08/08	07/17/08	07/08/08	0.	45.26	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	07/02/08	08/04/08	08/12/08	08/19/08	08/12/08	0.	42.06	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266A	Progress Energy Carolinas, Inc.	08/04/08	09/03/08	09/09/08	09/18/08	09/09/08	0.	38.34	Sumter - Feedmill
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/07/08	10/17/08	10/07/08	0.	14.21	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	10/02/07	10/31/07	11/08/07	11/19/07	11/08/07	0.	13.9	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	10/31/07	11/30/07	12/13/07	12/19/07	12/13/07	0.	14.24	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	11/30/07	01/02/08	01/13/08	01/18/08	01/10/08	0.	14.21	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	01/02/08	02/04/08	02/06/08	02/19/08	02/10/08	0.	13.9	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	02/04/08	03/03/08	03/10/08	03/19/08	03/10/08	0.	14.08	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	03/03/08	04/02/08	04/07/08	04/17/08	04/08/08	0.	13.99	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	04/02/08	05/02/08	05/12/08	05/18/08	05/12/08	0.	14.07	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	05/02/08	06/03/08	06/09/08	06/17/08	06/09/08	0.	14.23	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	06/03/08	07/02/08	07/08/08	07/17/08	07/08/08	0.	15.08	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	07/02/08	08/04/08	08/12/08	08/19/08	08/12/08	0.	14.03	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	08/04/08	09/03/08	09/09/08	09/18/08	09/09/08	0.	12.78	Sumter - Hatchery
Pilgrim's Pride Corporation	7159841266B	Progress Energy Carolinas, Inc.	09/03/08	10/02/08	10/07/08	10/17/08	10/08/08	0.	12.59	Sumter - Processing
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	09/04/07	10/04/07	10/23/07	10/18/07	10/23/07	0.	12.72	Sumter - Processing
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	10/04/07	11/01/07	05/23/08	11/16/07	05/23/08	0.13		

<u>Client Name</u>	<u>Account Number</u>	<u>Vendor Name</u>	<u>From Date</u>	<u>Read Date</u>	<u>Entry Date</u>	<u>Due Date</u>	<u>FRQ Date</u>	<u>Late Fee Amount Due</u>	<u>Location Name</u>	<u>Late Fee Percentage paid</u>	
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	11/01/07	12/03/07	12/12/07	12/18/07	12/13/07	0.13	25.44 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	12/03/07	01/03/08	01/04/08	01/18/08	01/07/08	0.13	25.44 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	01/03/08	02/05/08	02/06/08	02/20/08	02/06/08	0.13	25.44 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	02/05/08	03/04/08	03/05/08	03/19/08	03/05/08	0.13	25.44 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	03/04/08	04/03/08	04/04/08	04/18/08	04/04/08	0.13	25.44 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	04/03/08	05/05/08	05/07/08	05/20/08	05/07/08	0.13	25.44 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	05/05/08	06/04/08	06/05/08	06/19/08	06/05/08	0.	12.59 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	06/04/08	07/03/08	07/03/08	07/21/08	07/03/08	0.	12.82 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	07/03/08	08/05/08	08/06/08	08/20/08	08/06/08	0.	12.82 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	08/05/08	09/04/08	09/05/08	09/19/08	09/05/08	0.	12.82 Sumter - Processing		
Pilgrim's Pride Corporation	8331474919	Progress Energy Carolinas, Inc.	09/04/08	10/03/08	10/07/08	10/20/08	10/07/08	0.	12.82 Sumter - Processing		
Total Late Fees									\$0.91	\$7,040,762.71	Total Spend
											0.00001% Spend

Late Fee  
Percentage  
paid  
versus  
Spend

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2008-400-E

<p>In the Matter of:</p> <p>Progress Energy Carolinas, Inc.</p> <p>v.</p> <p>Pilgrim's Pride Corp.</p>	<p><b>Pilgrim's Pride, Inc.'s Motion for Continuance, or in the Alternative, Pilgrim's Pride, Inc.'s Response to Progress Energy Carolinas, Inc.'s Motion for Expedited Consideration of its Motion for Waiver of Commission Rule 103-331</b></p>
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**MOTION FOR LEAVE TO APPEAR *PRO HAC VICE***

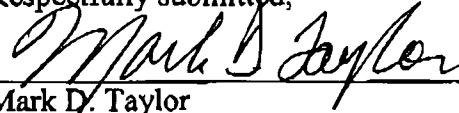
Mark D. Taylor, attorney herein, moves the Court for leave to appear *pro hac vice* and would respectfully show as follows:

1. The undersigned is an attorney representing Pilgrim's Pride Corp.
2. The undersigned is admitted to practice in and is a member in good standing of the Courts of the State of Texas, United States Supreme Court, the United States Court of Appeals – Fifth Circuit, the United States Court of Appeals – Eighth Circuit, the United States Court of Appeals – Ninth Circuit, the United States Court of Appeals – Tenth Circuit, the United States Court of Appeals – Eleventh Circuit; the United States District Court for the Northern District of Texas, the United States District Court for the Eastern District of Texas, the United States District Court for the Western District of Texas and the United States District Court for the Southern District of Texas. The undersigned has been admitted *pro hac vice* in one other suit in the State of South Carolina, styled *Randolph Benbow, et al. v. Gold Kist Inc.*, Civil Action No. 3:06-CV-02751-MBS, in the United States District Court for the District of South Carolina.
3. The undersigned has never been suspended from the practice of law nor been disciplined by any state or local committee or agency.

WHEREFORE, Mark D. Taylor prays that he be permitted to appear before this Commission with respect to this matter only.

Dated: November 3, 2008.

Respectfully submitted,



Mark D. Taylor  
Texas Bar No. 19713250  
BAKER & MCKENZIE LLP  
2300 Trammell Crow Center  
2001 Ross Avenue  
Dallas, Texas 75201  
Telephone: 214/978-3000  
Facsimile: 214/978-3099

ATTORNEY FOR RESPONDENT  
PILGRIM'S PRIDE CORPORATION